

**EPA REGISTRATION NUMBER 71995-25 – VOLUME 2**

Material to be added to a Mini-Jacket  
(in the case where an e-Jacket exists)

Reg. No. 71995-25

Send to SIG: check box ☒

This material is:

- ☒ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☐ Other: \_\_\_\_\_

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Vickie Walters

Phone: 703-305-5704 Division: RD/HB/PM-25

Date: 11/15/04



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NOV 15 2006

Ms. Rhonda M. Mannion  
Monsanto Company  
1300 I (Eye) Street, N.W., Suite 450 East  
Washington, DC 20005

Dear Ms. Mannion:

Subject: Roundup Weed & Grass Killer Super Concentrate (Add Stem Injection for Control of Several Weeds)

EPA Registration No. 71995-25

Application Dated August 6, 2006

The labeling referred to above, submitted above in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable, provided you make the following changes before you release the product for shipment.

1. Delete the phrase "or similar areas" from the fourth paragraph and replace with a list of specific use sites.
2. Add the statement "Based on the maximum annual use rate of glyphosate for these non-crop sites, the combined total of all treatments must not exceed 8.5 quarts of this product" to your label.

Submit one (1) copy of your final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling supersedes all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into master labeling and copies of master labeling submitted to the Agency for our files, at your next printing or within two years from the date of acceptance of supplemental labeling, whichever comes first. The Agency will consider a convincing argument as to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

*Vukie K. Welton for*  
James A. Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)



## SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR ROUNDUP WEED & GRASS KILLER SUPER CONCENTRATE BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using Roundup Weed & Grass Killer Super Concentrate as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the pesticide container label and on this supplemental labeling.

### Roundup Weed & Grass Killer Super Concentrate

EPA Reg. No. 71995-25

Roundup and Roundup design are registered trademarks of Monsanto Technology LLC.

FOR CONTROL OF JAPANESE KNOTWEED (*Polygonum cuspidatum*), BOHEMIAN KNOTWEED (*Polygonum bohemicum*), GIANT KNOTWEED (*Polygonum sachalinense*), CANADA THISTLE (*Cirsium arvense*), FIELD HORSEWEED (*Equisetum arvense*), GIANT HOGWEED (*Heracleum mantegazzianum*), AND POISON HEMLOCK (*Conium maculatum*) USING STEM INJECTION

Keep out of reach of children.

#### CAUTION!

In case of an emergency involving this product, Call Collect, day or night 800-246-7219.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This label must be in the possession of the user at the time of herbicide application.

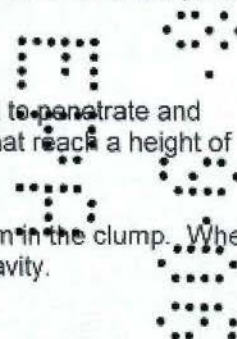
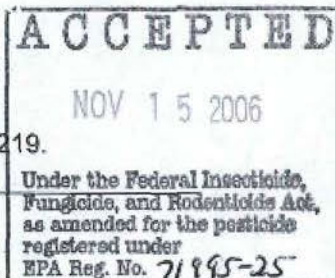
Japanese, Bohemian and Giant Knotweed, Canada Thistle, Field Horseweed, Giant Hogweed and Poison Hemlock are noxious weeds that are difficult to control using traditional weed management practices. Control of these weeds requires a concentrate dose of Roundup Weed & Grass Killer Super Concentrate to be directly injected into the stem of the weed. **Use only suitable injection equipment such as the JKinjection equipment from [www.JKinjectiontools.com](http://www.JKinjectiontools.com).** Use leather gloves during application to provide protection against accidental injection. NOTE: Ensure that the injection needle penetrates completely into the stem to allow the herbicide to enter the plant and prevent spillage onto the ground.

This product may be used to control weeds found growing in terrestrial residential, and other similar noncrop sites. These sites may include residential gardens, private properties, private parks, unimproved terrestrial sites, natural areas, or similar non-public sites. **IMPORTANT:** This product should not be used where plants are growing in water.

#### Japanese, Bohemian, and Giant Knotweeds

Treated plants should be actively growing and reach a size that allows the injection tool to penetrate and dispense the metered amount entirely within the internode injected. Generally, plants that reach a height of greater than 6 feet have the stem diameter to allow successful injections.

Inject 6 mls (cc) of this product below the 2<sup>nd</sup> or 3<sup>rd</sup> node above the ground of each stem in the clump. When used properly the equipment described will allow the herbicide to enter the internode cavity.



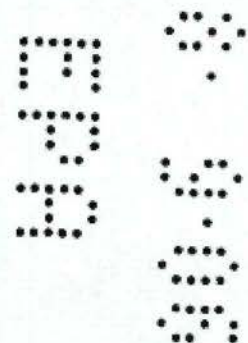
### Other Weeds

**Canada Thistle.** Inject 0.4ml (cc) of Roundup Weed & Grass Killer Super Concentrate into a freshly cut stem.

**Field Horseweed.** Inject 0.2 ml (cc) of Roundup Weed & Grass Killer Super Concentrate per horseweed stem near the base.

**Giant Hogweed.** Prepare a 5% stock solution by adding 7 fluid ounces (14 Tbs) of Roundup Weed & Grass Killer Super Concentrate to 1 gallon of water. Inject 6 ml (cc) of the 5% stock solution per single plant of giant hogweed.

**Poison Hemlock.** Prepare a 5% stock solution by adding 7 fluid ounces(14 Tbs) of Roundup Weed & Grass Killer Super Concentrate to 1 gallon of water. Inject 5 ml (cc) of a 5% stock solution per single plant of poison hemlock.





1. IS 3 PAGES		2. PETITION NO.		3. RECEIVED ON	
<input type="checkbox"/> YES <input type="checkbox"/> NO				<input type="checkbox"/> YES <input type="checkbox"/> NO	
4. METHOD OF SUPPORT		5. PRODUCT MANAGER		6. PROJECTED DATE	
<input type="checkbox"/> 1A <input type="checkbox"/> 1B <input type="checkbox"/> 1C				<input type="checkbox"/> YES <input type="checkbox"/> NO	
7. DATE FILED		8. DATE FILED		9. ACTION TYPE	
11/8/06				Add item request for Central of new weeds, 300	
10. DATE OUTGOING DATE		11. DATE OUTGOING DATE		12. DATE OUTGOING DATE	
<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
13. REVIEW TYPE		14. REVIEWER CODE		15. SIGNATURE OF REVIEWER	
A. REVIEWABILITY TEAM B. PRODUCT MANAGER TEAM C. PRODUCT MANAGER TEAM D. PRODUCT MANAGER TEAM E. PRODUCT MANAGER TEAM F. PRODUCT MANAGER G. INTERAGENCY REFERRAL H. COST-BENEFIT REVIEW I. PUBLIC COMMENTS REVIEW J. USE BRANCH INSECTICIDE EFFICACY K. USE BRANCH HERBICIDE EFFICACY L. USE BRANCH FUNGICIDE EFFICACY M. USE BRANCH ORBENTICIDE EFFICACY N. USE BRANCH DIMINUTANT EFFICACY O. CHEMISTRY BRANCH P. USE BRANCH ENVIRONMENTAL CHEMISTRY Q. TOXICOLOGY BRANCH R. USE BRANCH ENVIRONMENTAL SAFETY S. T.		REVIEWER CODE (Initials)		SIGNATURE OF REVIEWER VIEW RL 11/08/06 delete similar receipt add maximum rate statement	
16. COMMENT CODE		17. DATE REVIEW COMPLETED		18. DATE REVIEW COMPLETED	
<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO	
19. PRODUCT MANAGER SIGNATURE		20. TYPE OF RESPONSE		21. DATE	





MONSANTO COMPANY  
1900 I (EYE) STREET, NW  
SUITE 450 EAST  
WASHINGTON, D.C. 20005  
PHONE (202) 383-2566  
FAX (202) 789-1748  
<http://www.monsanto.com>

7 August 2006

**Hand Delivered**

Document Processing Center (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Mr. Jim Tompkins (7505P)  
Product Manager (Team 25)

Subject: **Reg. No. 71995-25: Submission of Supplemental Labeling for the Control of Knotweed, Thistle, Horseweed, Hogweed, and Poison Hemlock.**

Dear Mr. Tompkins:

Monsanto is herein requesting the Agency approve a new supplemental label for *Roundup® Weed & Grass Killer Super Concentrate* (Reg. No. 71995-25) for the control of Japanese, Bohemian and Giant Knotweed, Canada Thistle, Field Horseweed, Giant Hogweed and Poison Hemlock using stem injection.

The spread of invasive, and sometimes noxious, plants continue to threaten the balance and diversity of vegetation in residential, public and nature areas across the United States. Some invasive plants, such as Giant Hogweed and Poison Hemlock, also present a significant health hazard to the public. Giant Hogweed, in particular, poses a significant threat to the public because exposure to plant oils and sap can cause severe skin irritation and produce painful, burning blisters in susceptible populations. Poison Hemlock is moderate to highly toxic to animals, ingestion of plant leaves and seeds can result in poisoning and birth defects.

Stem injection of Roundup branded products has been shown to effectively control many invasive plant species. Stem injection is also preferred by many small, local conservation groups because it provides a concentrated lethal dose of active ingredient to the plant while minimizing contact with the plant and drift to adjacent desirable vegetation. Most injection treatments require less than 6 milliliters per plant. Based on a treatment rate of 6 milliliters per plant, a 2.5

gallon container of Roundup Pro (the smallest volume presently sold) would treat more than 1560 plants, substantially more treatments than a typical local conservation group needs. At the request of these conservation groups, Monsanto is seeking to register these stem injection uses on Roundup Weed & Grass Killer Super Concentrate (Reg. No. 71995-25) which is distributed in smaller unit volume containers.

Stem injection applications have been previously approved by the Agency on a similar glyphosate formulation; Roundup Pro Concentrate Supplemental Label for Hollow Stem Injection, Registration 524-529, approved by the Agency on 18 May 2006. Monsanto now wishes to add these stem injection uses to Roundup Weed & Grass Killer Super Concentrate, Reg. No. 71995-25, for the reasons stated above. The proposed rates for Roundup Weed & Grass Killer Super Concentrate are essentially the same as the rates approved for Roundup Pro Concentrate except some of the proposed injection rates are marginally higher (1 milliliter or less).

**Monsanto considers this submission a fast track amendment with no data review, as such we do not anticipate a fee for completion of this action. Please address any fee requirement response to Regulatory.Affairs@Monsanto.com.**

Enclosed with this letter are:

- Application for Pesticide Registration (Form 8570-1) – **OPP ID 307457**
- Five copies of the proposed Supplemental Label for Roundup Weed & Grass Killer Super Concentrate (Reg. No. 71995-25)

Should you have any questions, please contact Dr. Russ Schneider at our Washington office (202) 783-2460 or me directly at (314) 694-8785 or rhonda.m.mannion@monsanto.com.

Sincerely,



Rhonda M. Mannion  
Registration Manager

cc: R. Schneider / DC Office  
J. Lambert / A2NC  
Regulatory File Copy





United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**307457****Application for Pesticide – Section I**

1. Company/Product Number EPA Reg. No. 71995-25	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Roundup Weed & Grass Killer Super Concentrate	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) N.W., Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section – II**

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of new supplemental label

regulatory.affairs@monsanto.com**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) <u>Plant Cells</u>		
* <b>Certification must be submitted</b>		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Package wgt. No. per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Various		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section – IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Russell Schneider, Ph.D.		Title Director, Regulatory Affairs DC		Telephone No. (Include Area Code) (202) 783-2460	
<b>Certification</b> <i>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</i>					6. Date Application Received <b>(Stamped)</b> 
2. Signature <u>Rhonda M. Mannion</u>		3. Title Registration Manager			
4. Typed Name Rhonda M. Mannion (314) 694-8785		5. Date August 6, 2006			

Material to be added to a Mini-Jacket  
(in the case where an e-Jacket exists)

Reg. No. 71995-25

Send to SIG: check box ☒

This material is:

- ☒ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☐ Other: \_\_\_\_\_

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Vickie Jc Walters

Phone: 703-305-5704 Division: RD/HB/PM-25

Date: 5/18/06





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAY 18 2006

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Rhonda M. Mannion  
Monsanto Company, Lawn & Garden Products  
1300 I Street, N.W. Suite 450 East  
Washington, DC 20005

Dear Ms. Mannion:

Subject: Roundup Weed & Grass Killer Super Concentrate (Update First Aid and Other  
Changes)  
EPA Registration No. 71995-25  
Application Dated March 27, 2006

The labeling referred to above, submitted in connection with registration under the Federal  
Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. Amended labeling  
supersedes all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

*Vickie K. Walters for*  
James A. Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

EPA Reg No. 71995-25

[Editorial Notes: Bracketed text [ ] is for internal use or serves as a 'place holder' for graphics. Parenthetical text ( ) denotes optional wording.]

[Refer to APPENDIX 1 for consolidated list of label claims.]

[Refer to APPENDIX 2 for packaging related claims/instructions]

## Roundup® Weed & Grass Killer Super Concentrate

**Active Ingredient:**

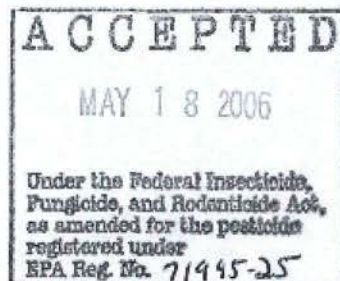
Glyphosate, isopropylamine salt ..... 50.2 %

Other Ingredients ..... 49.8 %

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

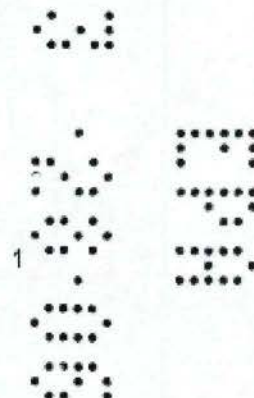
See back panel booklet for additional precautionary statements.



NET [ ]

71995-25

EPA Master Label Amendment Submission Dated 27-Mar-2006  
Previous EPA Stamped Label Dated 16-Sep-2004





**EPA Reg No. 71995-25**

*[OPTIONAL TEXT]*

Open (booklet for details)

Resealable Label for directions & Precautions

**Product Facts**

Makes up to [ ] gallons

Treats up to [ ] sq ft (approx. size of [ ] tennis courts)

*[see Appendix 2 for calculations]*

**KILLS** *[illustrate grassy, broadleaf and woody weeds]*

**WEEDS** **KILLS ALL TYPES OF WEEDS & GRASSES**

**WHERE** • On patios, walkways, driveways, gravel or mulch beds

**TO USE** • Around fruits, vegetables, flowers, shrubs or trees

• Along fences

• In large areas - For lawn replacement  
For garden plot preparation

• (Other areas in (of) your yard)

**AMOUNT** **For best results**

**TO USE** • 2½ fl oz (5 Tbs) per gallon of water (for established or tough weeds)

• *[OPTIONAL TEXT]* For easy to kill weeds such as seedlings, add 1½ fl oz (3 Tbs) per gallon of water

*[Phone icon]*

**Questions, Comments or Information**

*[computer icon]*

**Call (insert contact #)** [www.roundup.com](http://www.roundup.com)

*[For products where an anti-theft device has been added]* This bottle contains an anti-theft device, either inside or on the back of the bottle. It does not affect Roundup's performance.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**HOW IT WORKS** *[Optional illustration]* *[Optional section]*

*[Insert brand name]* enters plants through foliage and moves systemically to the roots, killing weeds by stopping the production of a substance found in plants. Any product



**EPA Reg No. 71995-25**

(Roundup) [or insert brand name] not absorbed by plants breaks down into natural materials without moving in or on the soil to untreated plants. Weeds usually yellow and wilt within 2 to 4 days with complete kill in 1 to 2 weeks.

[ALTERNATE TEXT] Roundup [or Insert Brand Name] is absorbed by the weed's leaves. It moves through the weed to the root, stopping the production of an essential enzyme found in plants. Weeds die, roots and all - so weeds don't grow back. Kills only what you spray. Any product not absorbed by the plant breaks down into natural materials without moving in or on the soil to untreated plants.

**MIXING INSTRUCTIONS**

[Optional tank sprayer illustration]

**Tank (Pump-Up) Sprayer** (plastic, aluminum, fiberglass, plastic-lined steel or stainless steel)

- [OPTIONAL TEXT] For easy to kill weeds such as seedlings, add 1½ fl oz (3 Tbs) to 1 gallon of water
- (For tough established weeds / For best results,) add 2½ fl oz (5 Tbs) to 1 gallon of water
- Spot treat or spray evenly over 300 sq ft.
- [OPTIONAL TEXT] Roundup brand pump-up sprayer is recommended

[Optional DNS illustration]

**Hose-End Sprayer**

For large areas, consider using the Ortho Dial 'n Spray®

- Set dial to 2½ oz.
- To sprayer jar add 2½ fl oz (5 Tbs) for each 300 sq ft. DO NOT add water.
- Spray evenly over measured area.
- After spraying, unused product can be poured back into its original container.

[Optional sprayer illustration]

**Roundup 1.33 Gallon Sprayer**

- Add entire contents of the 6.5 fl oz (13 Tbs) [Insert Brand Name for refill super concentrate] to the empty Roundup sprayer and fill with water.

OR

- Add 6.5 fl oz (13 Tbs) Roundup Super Concentrate to the empty Roundup sprayer and fill with water.



**EPA Reg No. 71995-25**

1 Tablespoon (Tbs) = 3 teaspoons (tsp)

1 fl oz = 2 Tbs

[OPTIONAL TEXT] For easy to kill weeds such as seedlings, add 1½ fl oz (3 Tbs) to 1 gallon of water

Do not (mix, store or) apply with (in) a galvanized or unlined steel (except stainless steel) sprayer, or through any irrigation system.

**HOW TO CLEAN SPRAYER**

To clean sprayer after use, rinse sprayer and all sprayer parts with water 3 times. Spray rinse water on bare soil or gravel. After cleaning, sprayer may be used for other products.

**HOW TO APPLY [optional illustration]**

- Spray the weeds or grasses you want to kill until thoroughly wet.
- When spot treating weeds around desirable plants, shield plants from drift with a sheet (piece) of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

**IMPORTANT**

Do not spray plants or grasses you like - they will die. Not recommended for spot weed control in lawns since Roundup kills lawn grasses.

**WHEN TO APPLY [OPTIONAL ILLUSTRATION]**

- Apply when weeds are actively growing. (Use anytime weeds and grasses are actively growing.)
- For best results, apply during warm, sunny weather (above 60° F) (to accelerate systemic movement from foliage to roots.)
- Apply when air is calm to prevent drift to desirable plants.
- (RAINPROOF Protection:) Rain or watering (30, 45, 60, or 90 minutes; 2 hours, 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after application will NOT wash away effectiveness.
- [OPTIONAL TEXT] If used to control weeds around fruit or nut trees, caneberries, or grapevines, allow 17 days before harvesting.
- [OPTIONAL TEXT] Apply when weeds are small and before seeds form. Established (Hard to kill) weeds may require a repeat application.



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*[Re-entry icon]* To prevent tracking product to unintended areas such as your yard, keep people and pets out of treated area until spray has dried.

*[ALTERNATE TEXT]* People and pets may enter treated area after spray has dried.

<b>WHEN TO REPLANT</b> <i>[OPTIONAL ILLUSTRATION]</i> <i>[OPTIONAL SECTION]</i>
---

- All ornamental flowers, trees and shrubs may be planted **1 day after** application.
- Lawn grasses, herbs, vegetables (all), and fruits may be planted **3 days after** application.

<b>ADDITIONAL TIPS</b> <i>[OPTIONAL ILLUSTRATION]</i> <i>[OPTIONAL SECTION]</i>
---

- **To Kill Vines**
  - If vines are growing up poles, fences, or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray vines thoroughly.
  - If vines are climbing shrubs or tree trunks with green bark, cut vines at base and treat as directed for stumps or spray regrowth. If spraying regrowth, shield shrubs and tree trunks from spray drift with a sheet (piece) of cardboard or plastic.
- **To Kill Bamboo**
  - Cut canes close to the ground.
  - Make cut just below a stem joint to create a hollow stem reservoir.
  - Pour 1 Tbs of undiluted product into the hollow stem reservoir.
  - Browning of the canes will occur in 7-14 days.
  - Spray foliage if regrowth occurs.
- **To Kill Stumps**
  - Cut living stump close to ground.
  - Drive (drill) 4 to 5 holes into freshly cut stump.
  - Immediately pour undiluted product into holes.

**IMPORTANT:** Some trees may share the same root system. Adjacent trees having a similar age, height and spacing may signal a shared roots system. Injury may occur to non-treated trees when one or more trees sharing common roots are treated.

- **For Lawn Replacement**

Use *[Insert brand name]* to kill a (an old) lawn and (its) weeds before planting a new lawn.

- Skip one mowing before spraying.



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- Use 2½ fl oz (5 Tbs) per gallon of water for each 300 sq ft.
- If soil is dry, water before application and 2 to 3 days after application.
- If green patches remain after 7 days, reapply.
- Wait (at least) 3 days after last application to rake, till or replant with seed or sod.
- **Kudzu**  
For best results, apply in mid to late summer when vines are mature and actively growing.
- **Wild Blackberry**  
Spray anytime plants are actively growing. Dead canes should be cut down and removed. Reapplication is often required to kill deep roots.
- **Poison Ivy & Poison Oak**  
Contact with these plants anytime of the year can cause an allergic reaction. Spray anytime plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.
- **For Flowerbed & Garden (Plot) Preparation**  
Use [*Insert brand name*] to kill weeds, grasses and brush before planting flowers, fruits, vegetables or herbs.
  - If soil is dry, water before application and 2 to 3 days after application.
  - Use 2½ fl oz (5 Tbs) per gallon of water for each 300 sq ft. Apply evenly over treatment area.
  - Wait 1-3 days before planting garden (flowers, trees and shrubs) See **When To Replant** section for details.

### WHEN TO HARVEST [OPTIONAL ILLUSTRATION]

If used to control weeds around fruits or nuts, allow the following number of days before harvesting:

- Citrus (citron, grapefruit, lemon, lime, mandarin, orange, tangelo and tangerine) – **1 day.**
- Nuts (almond, beechnut, cashew, chestnut, hazelnut, pecan, pistachio and walnut) – **3 days.**
- Apple, avocado, banana (plantains), berries (except cranberries), dates, figs, grapes, kiwi fruit, loquat, passion fruit, pear, persimmon, pomegranate and quince – **14 days.**
- Apricot, cherries, nectarine, olives, peach, plum and prunes – **17 days.**



(OR)

- [The following statement may instead be placed in the **When To Apply** section] If used to control weeds around fruit or nut trees, caneberries or grapevines, allow 17 days before harvesting.

[OPTIONAL SECTION]

**KILLS ALL TYPES OF WEEDS & GRASSES** [OPTIONAL ILLUSTRATION]

**Weeds (including):** Artichoke thistle, beggarweed, black medic, blue mustard, blue toadflax, brassbuttons, broadleaf plantain, burclover, buttercup, Canada thistle, cattail, chickweed, cocklebur, common groundsel, common mullein, common plantain, common ragweed, creeping beggarweed, creeping-charlie, curly dock, dandelion, dog fennel, evening primrose, false dandelion, fiddleneck, field bindweed (wild morningglory), field pennycress, filaree, Florida pusley, garden spurge, henbit, horsenettle, horseradish, horseweed/ marestalk, iceplant, knapweed, knotweed, lambsquarters, lantana, little bittercress, London rocket, mallow, mayweed, milkweed, mouseear chickweed, narrowleaf (buckhorn) plantain, nightshade (silverleaf), oldenlandia, oxalis, Pennsylvania smartweed, pennywort, poison hemlock, prickly lettuce, primrose, prostrate spurge, puncturevine, ragweed, red clover, redroot pigweed, shepherdspurse, smooth catsear, smooth pigweed, sowthistle, spotted spurge, tansy ragwort, tansymustard, teaweed, trumpetcreeper, tumble mustard, Virginia creeper, white clover, whitetop, wild barley, wild mustard, wild oats, wild sweet potato, yellow starthistle, and other broadleaf weeds

**Grasses (including):** Annual bluegrass, annual ryegrass, bahiagrass, barnyardgrass, bentgrass, Bermudagrass, brome grass, Cogongrass, crabgrass, creeping bentgrass, dallisgrass, fall panicum, fescue, field sandbur, foxtail, goosegrass, guineagrass, Johnsongrass, Kentucky bluegrass, kikuyugrass, lovegrass, maidencane, nimblewill, nutsedge, orchardgrass, pampas grass, perennial ryegrass, purple nutsedge, quackgrass, sandspur, smooth brome grass, sprangletop, St. Augustinegrass, tall fescue, Texas panicum, Timothy, torpedograss, vaseygrass, witchgrass, yellow nutgrass, zoysia and other grassy weeds

**Brush (Tough Weeds) Unwanted Tress, Shrubs & Vines (including):**

Alder, ash, (quacking) aspen, bamboo, blackberry, bluegum eucalyptus, broom (French, Scotch), buckwheat, ceanothus, chamise, cherry, coyote brush, dewberry, elderberry, elm, eucalyptus, giant reed, hawthorn, hazel, honeysuckle, kudzu, locust, madrone, maple, oak, persimmon, poison oak, poison ivy, poplar, raspberry, sage, sagebrush, salmonberry, saltcedar, sassafras, sumac, sweetgum, tan oak, thimbleberry, tree tobacco, wild rose (multiflora) willow and other tough weeds



**STORAGE AND DISPOSAL** [TRASH CAN ILLUSTRATION]

**PESTICIDE STORAGE:** Store product in original container in a safe place away from direct sunlight.

**DISPOSAL: If Empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP (or other appropriate toll free number) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**HOW TO REFILL ROUNDUP READY-TO-USE CONTAINERS** [OPTIONAL SECTION]

- **24 fl oz Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 1 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.
- **½ Gallon Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 2½ fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.
- **Gallon Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 5 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.
- **1.33 Gallon Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 6.5 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.
- **6L Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 8 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.
- **2 Gallon Roundup Weed & Grass Killer Ready-To-Use Plus:**  
To empty container add 10 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

**PRECAUTIONARY STATEMENTS** [OPTIONAL ILLUSTRATION]

**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.



FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes.</li> <li>• Call a poison control center (insert contact #) or doctor for treatment advice.</li> </ul>
Emergency Medical Information	
<ul style="list-style-type: none"> <li>• Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</li> <li>• You may contact (insert contact #) for emergency medical treatment information.</li> <li>• This product is identified as [Insert brand name], EPA Reg. No. 71995-25</li> </ul>	

**ENVIRONMENTAL HAZARDS:** Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

**NOTICE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

This product is protected by U.S. Patents No. [Insert relevant patent numbers]. Other patents pending. No license granted under any non-U.S. patent(s).

This is an end-use product. Monsanto does not intend and has not registered it for reformulation or repackaging.

[phone icon]	<b>Questions, Comments or Information</b>	[computer icon]
	Call (insert contact #) <a href="http://www.roundup.com">www.roundup.com</a>	

[Insert relevant trademark statements].

[OPTIONAL TEXT]



EPA Reg No. 71995-25

**ROUNDUP FAMILY OF PRODUCTS**

*Visit the Roundup website to learn more about the Roundup family of products for the best solution to your toughest weed problems.*

*[Insert graphic – Roundup product family photo]*

©[ ] MONSANTO COMPANY

Manufactured for  
Monsanto Company, Lawn & Garden Products  
P.O. Box 418  
Marysville, OH -43041  
PPN  
EPA Reg. No. 71995-25  
EPA Est. 239-IA-3<sup>l</sup>, 58996-MO-1<sup>A</sup>  
Superscript is first letter of lot number  
Made in USA

**APPENDIX 1 – Consolidated List of Label Claims**  
*[Ordered alphabetically]*

- 20% more concentrated
- 20% stronger
- 20% stronger to speed absorption to the root
- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Also use for large jobs such as lawn renovation and vegetable and flower garden preparation
- Approved for most (many) lawn and garden uses.
- Before *[weed graphics]* / After *[weed graphics]*
- Begins absorbing on contact
- Best Roundup Concentrate Value
- Can be used around (small) fruits and vegetables
- Can be used for habitat restoration, controlling exotic vegetation, and for site preparation of wildlife food plots.
- Can reseed or sod lawns 3 days after treatment
- Concentrated for extra value
- Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will replace the product or refund the purchase price.
- Covers up to 300 sq ft per gallon of spray
- Dead Weeds Guaranteed (or Your Money Back)
- Does not have soil activity
- Economical (concentrate formula)
- Easy to apply with an Ortho Dial 'n Spray®, hose-end, tank or (hand held) trigger sprayer
- Even if it rains – Roundup won't lose its effectiveness
- Exclusive Roundup formula
- FastAct™ (Technology)
- For control that doesn't (won't) wash away
- For general weed control - kills weeds and grasses in 2 to 4 weeks - roots and all
- Guaranteed
- Guaranteed same effective results even if it rains within an hour (hours)
- Improved extra strength formula
- Improved formula, completely kills even the toughest weeds and grasses
- Improved formulation -now RainFast - fast uptake
- Kills almost all (annual and perennial) weeds, grasses and other unwanted plants
- Kills existing weeds only, no residual activity in soil
- Kills more weeds in more places



## EPA Reg No. 71995-25

- Kills over 100 weeds
- Kills the root so weeds don't come back
- Kills the roots of (both) broadleaf and grassy weeds
- Kills the weed you see and the root you don't
- Kills (to) the root(s)! (Guaranteed!)
- Kills unwanted weeds and grasses, roots and all
- Kills weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard.
- Kills weeds, roots and all
- Lawns and gardens can be reseeded or planted soon after treatment
- Make only what you need
- Multipurpose grass and broadleaf weed control
- NEW!
- No odor
- No root. No weed. No problem.
- NOW!
- Now a shorter wait for replanting!
- Once it enters the plant, it won't wash off
- Ornamental gardens can be reseeded or planted 1 day after treatment.
- Only Roundup's effectiveness (exclusive formula) won't be washed away by rain or watering (30, 45, 60, 90 minutes; 2 hours, 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after treatment
- RAINPROOF (RAINFEST) in (30, 45, 60, 90 minutes; two hours, 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes)) (for control that won't wash away)
- Results in 24 hours
- (Roundup) Kills the weed you see and the root others leave behind
- Roundup kills weeds and grasses in – Patios – Driveways – Sidewalks – Gardens and other non-lawn areas
- Satisfaction guaranteed or we will gladly refund purchase price
- Satisfaction guaranteed or your money back with proof of purchase
- Speeds absorption to the root for complete kill
- Spray weeds (Use) in flowerbeds, around trees, shrubs and around fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Starts working immediately
- Stronger
- The Strongest Roundup you can buy
- Tougher formula
- Transorb technology speeds Roundup to the root to kill even tough weeds
- Trusted Results for Guaranteed Satisfaction
- Use around fruits and vegetables.
- (Use) For Bamboo Control



**EPA Reg No. 71995-25**

- (Use) For Brush Control
- (Use) For General Weed Control: Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways. Use to trim and edge landscape areas
- (Use) For Landscaping: Use to prepare areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings
- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- (Use) For Lawn Renovation
- (Use) For Spot Spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways
- (Use) For Stumps
- (Use) For Wildlife Areas: Use to prepare areas for planting wildlife food. Exotic or undesirable plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants.
- (Use in) Apply with a Big Shot™ Multi-Purpose Sprayer or other tank sprayer, Ortho Dial 'n Spray® or other hose-end sprayer, or a (hand held) trigger sprayer
- Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns
- Use to refill Roundup Ready-To-Use containers
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction
- Visible results in 2 to 4 days (hours)
- Water based formula
- (Weeds) start dying in 1 day (24 hours)
- Won't wash away (off)
- Works first time, every time- guaranteed
- Works only when absorbed by the foliage of weeds
  
- *[Promotional options]*
- Free [    ] with this purchase of Roundup concentrate quart
- ☒ % Free (More)
- FREE REFILL
- FREE SAMPLE
- Free weed guide inside
- SAMPLE NOT FOR SALE
- Save up to \$[x] on (your) next purchase



**APPENDIX 2 – Packaging Related Claims**

NET xx fl oz (qt or gal) (xx mL or L)  
5 fl oz (148 mL)  
6 fl oz (177 mL)  
6.5 fl oz (192 mL)  
8 fl oz (237 mL)  
13 fl oz (384 mL)  
16 fl oz (1 pt) (473 mL)  
32 fl oz (1 qt) 946 mL)  
40 fl oz (1.18 L)  
53.7 fl oz (0.42 gal) (1.59 L)  
64 fl oz (1.89 L)  
128 fl oz (1 gal) (3.79 L)

*[Net contents]* Makes up to 'X' gallons  
Makes between 'X' and 'Y' gallons  
Mix with water to make 'X' gallons of spray solution  
Treats (covers) up to 'Z' sq ft (approximate size of XX tennis court)  
Mix with water to cover up to 'Z' sq ft  
 $[X = \text{net contents} \div 1.5]$   
 $[Y = \text{net contents} \div 2.5]$   
 $[Z = X * 300]$   
 $[XX = Z \div 2808]$

*[Pint]* Makes up to 10 gallons  
Makes between 6 – 10 gallons  
Mix with water to make 10 gallons of spray solution  
Covers up to 3,000 sq ft  
Mix with water to cover up to 3,000 sq ft

*[Quart]* Makes up to 21 gallons  
Makes between 12 – 21 gallons  
Mix with water to make 21 gallons of spray solution  
Covers up to 6,300 sq ft  
Mix with water to cover up to 6,300 sq ft

*[0.42 Gallon]* Makes up to 35 gallons  
Makes between 21 – 35 gallons  
Mix with water to make 35 gallons of spray solution  
Covers up to 10,500 sq ft

**EPA Reg No. 71995-25**

Mix with water to cover up to 10,500 sq ft

[Gallon] Makes up to 85 gallons  
Makes between 51 – 85 gallons  
Mix with water to 85 gallons of spray solution  
Covers up to 25,500 sq ft  
Mix with water to cover up to 25,500 sq ft

- New! Larger size, covers up to [ ] sq ft
- BONUS SIZE [ ] % MORE!
- Value sized
- *With (the convenient) measuring cup, mixing [Insert brand name] (controlling weeds around your home) has never been easier*
- *With (the convenient) measuring cup, controlling weeds all around your home has never been this fast and easy*



**EPA Reg No. 71995-25**

**Description of Changes for 071995-00025.20060327.pdf**

*This label amendment incorporates the following changes:*

- Updated Reentry Statement
- Updated First Aid
- Updated Environmental Hazards
- Updated Appendix 1

1. IS A PUBLIC CASE?		2. PETITION NO.		3. RECEIVED ON	
<input type="checkbox"/> YES	<input type="checkbox"/> NO			<input type="checkbox"/> YES	<input type="checkbox"/> NO
4. METHOD OF SUPPORT		5. PRODUCT MANAGER		6. PROJECTED DATE	
<input type="checkbox"/> 1A	<input type="checkbox"/> 1B <input type="checkbox"/> 1C			<input type="checkbox"/> YES	<input type="checkbox"/> NO
7. DATE FILED	8. DATE FILED	9. ACTION TYPE		10. DATE OUTSTANDING DATE	
5/9/06	AWP	Update First Aid & other changes 300		<input type="checkbox"/> YES	<input type="checkbox"/> NO
11. REVIEW TYPE	12. REVIEWER CODE	13. SIGNATURE OF REVIEWER		14. COMMENT CODE	15. DATE REVIEW COMPLETED
A	REVIEWABILITY TEAM				
B	PRODUCT MANAGER TEAM EFFICACY REVIEW				
C	PRODUCT MANAGER TEAM HUMAN SAFETY REVIEW				
D	PRODUCT MANAGER TEAM ENVIRONMENTAL SAFETY REVIEW				
E	PRODUCT MANAGER TEAM RESIDUATION REVIEW				
F	PRODUCT MANAGER	VICW NAC			05/09/06
G	INTERAGENCY REFERRAL				
H	COST-BENEFIT REVIEW				
I	PUBLIC COMMENTS REVIEW				
J	USE BRANCH INSECTICIDE EFFICACY				
K	USE BRANCH HERBICIDE EFFICACY				
L	USE BRANCH FUNGICIDE EFFICACY				
M	USE BRANCH ROENTGENIC EFFICACY				
N	USE BRANCH DISINFESTANT EFFICACY				
O	CHEMISTRY BRANCH REMOVE CHEMISTRY				
P	USE BRANCH ENVIRON. HEALTH CHEMISTRY				
Q	TOXICOLOGY BRANCH HUMAN SAFETY				
R	USE BRANCH ENVIRON. HUMAN SAFETY				
S					
T					
PRODUCT MANAGER SIGNATURE		TYPE OF RESPONSE		CODE	



# Fee for Service



This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies?    ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.    25

Receipt No.

S- 792338

EPA File Symbol/Reg. No.

71995-25

Pin-Punch Date:

3/28/06

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

## Parent/Child Decisions:

Human Studies:

Cite-All

Selective Support

Tox (excluding Six-Pack)

Other Human Research (efficacy, exposure, etc.)

Reviewer: RKumar

Date: 3-30-06

Remarks:

**NON - FEE**





United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier  
 Number

**303919**

**Application for Pesticide – Section I**

1. Company/Product Number Monsanto Company, Lawn & Garden Products; 71995-25	2. EPA Product Manager Mr. James Tompkins	3. Proposed Classification  <input type="checkbox"/> None <input type="checkbox"/> Restricted
Company/Product (Name) Monsanto Company, Lawn & Garden Products; Roundup® Weed & Grass Killer Super Concentrate	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company, Lawn & Garden Products 1300 I (Eye) St., N.W., Suite 450 East Washington, DC 20005  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(B)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section – II**

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

PRIA address: REGULATORY.AFFAIRS@MONSANTO.COM

Submission of Master label amendment

**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Package wgt. No. per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product  <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section – IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Russell Schneider, Ph.D.	Title Director, Regulatory Affairs DC	Telephone No. (Include Area Code) (202) 383-2866
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature <i>Rhonda M. Mannion / ts</i>	3. Title Registration Manager	6. Date Application Received (Stamp)
4. Typed Name Rhonda. M. Mannion Tel. (314) 694-8785	5. Date 27 March 2006	



MONSANTO



MONSANTO COMPANY

1300 I (L) STREET, NW  
SUITE 450 EAST  
WASHINGTON, D.C. 20003  
PHONE (202) 383-2866  
FAX (202) 729-1748  
<http://www.monsanto.com>

March 27, 2006  
**HAND DELIVERED**

Document Processing Center (AMEND)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2,  
1801 South Bell Street  
Arlington, VA 22202-4501

Attention: Mr. James Tompkins (7504C)  
Product Manager (Team 25)

Subject: **Submission of Amended Master Label (EPA Reg. No. 71995-25)**  
**Roundup® Weed & Grass Killer Super Concentrate**

Dear Mr. Tompkins:

Monsanto is herein submitting to the Agency an amended Master Label for Registration Number 71995-25. The revised Master Label incorporates the following changes:

- Modified Reentry statement to be consistent with reentry statement in our Roundup professional products such as Roundup Pro Concentrate (EPA Reg. No. 524-529).
- Updated First Aid
- Updated Environmental Hazards
- Updated Appendix 1

**This submission is classified as part of the Agency Fast-Track Program. Therefore, no fee is due.**

The following documents are enclosed with this letter:

- Application for Pesticide (form 8570-1)
- CD-Rom containing this cover letter, required forms, and the electronic label (filename: 071995-00025.20060327.pdf)
- Certification with Respect to Label Integrity
- Three copies of the amended Master Label

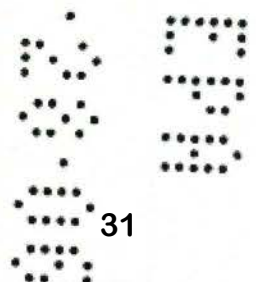
Should you have any questions, please contact Dr. Russ Scheider at our Washington office (202)383-2866, or me directly at (314) 694-8785 or via email at [rhonda.m.mannion@monsanto.com](mailto:rhonda.m.mannion@monsanto.com).

Sincerely,

*Rhonda M. Mannion /ts*

Rhonda M. Mannion  
Registration Manager

cc: Russ Schneider  
File copy



# Certification with Respect to Label Integrity

Version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
071995-00025	03/27/2006	071995-00025.20060327.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Rhonda M. Mannion/ta  
Signature

27 March 2006  
Date

Rhonda M. Mannion  
Name (typed)

Registration Manager  
Title

